

EXHIBIT 14

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Case No. 03-MDL-1570 (GBD) (SN)

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IN RE: TERRORIST ATTACKS ON

SEPTEMBER 11, 2001

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REMOTE VIDEOTAPED DEPOSITION OF
VICTOR COMRAS
Ft. Lauderdale, Florida
July 23, 2021

Reported By:
ERIC J. FINZ

1 VICTOR COMRAS

2 A. Well, socially as well as
3 through his other contacts. There was
4 reports from Mr. Fadl and others that
5 noted that he was in areas and involved
6 with Mr. bin Laden. He also notes and he
7 agrees in his testimony in deposition
8 that he was associated with the
9 conference where bin Laden, he met bin
10 Laden. And also the fact that they were
11 both signatories in one of bin Laden's
12 companies.

13 Q. Your sole citation for the
14 proposition that Mr. Kadi became further
15 acquainted with Osama bin Laden during
16 this period of time is KADI 2944, am I
17 correct, it's page 14 and footnote 38.

18 A. Let's take a look at that one.

19 MR. SALERNO: Okay. Would the
20 court reporter kindly put up the
21 next exhibit, 008.

22 (Deposition Exhibit 978 for
23 identification, document headed
24 "Answers to Questions Concerning
25 the Petition to Delist Yassin

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2 Am I correct?

3 A. Which line are you talking
4 about?

5 Q. The last two lines of page 17
6 of your report, running into page 18.

7 A. Okay, yes. Roughly at the
8 same time as establishing the Muwafaq
9 Foundation, Kadi independently
10 incorporated a related business, Muwafaq
11 Limited in the Isle of Man, a tax haven
12 with minimum regulatory oversight. Okay.

13 Q. And also on page 18, the last
14 full paragraph, you say that Mr. Kadi
15 registered a number of other companies in
16 the Isle of Man. Correct?

17 A. Correct.

18 Q. Is it your expert opinion that
19 registering a company in a tax haven is
20 an indicator of terrorism financing?

21 A. It is a factor. It is to be
22 considered when somebody is investigating
23 the possibilities of terrorism financing.
24 It is not an indicator.

25 Q. So you would not scrutinize

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2 every company registered in a tax haven
3 for terrorism; would you?

4 A. No. But everyone that's
5 involved in -- potentially involved in
6 terrorism, I would note that they were
7 registered in a tax haven.

8 Q. Registering a company in a tax
9 haven is not even listed as a red flag in
10 your own list at page 7 of your main
11 report. Is it?

12 A. It is not a red flag. It is a
13 factor. Again, it's something that an
14 investigator would look at as a factor,
15 not as an indicator. It adds on. It
16 doesn't -- in itself it is not at all a
17 red flag.

18 Q. Okay. On page 42 of your main
19 report.

20 A. Okay.

21 Q. The first full paragraph.

22 A. I'm almost there. First full
23 paragraph. Okay.

24 Q. And in referring to some
25 Leemount transactions, you say, quote,

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2 running a major terrorist organization.

3 Q. Mr. Comras, I didn't ask you
4 what else you were aware, I asked if you
5 were aware of this given it's in the
6 interview cite. I wish you would confine
7 yourself to the questions and not view it
8 as an opportunity to make a speech about
9 the subject matter, please.

10 A. I'm just saying I'm aware of
11 what I put in my report. I'm not aware
12 of what is necessarily in other material
13 that I did not use. It could have been
14 that it was -- again, the strict answer
15 for all of this is, maybe somewhere in my
16 subconscious, because I had read it, it
17 was there. But I did not reflect on it,
18 did not think about it and did not find
19 it to be useful.

20 Q. You refer on page 16 of your
21 rebuttal report to the fact that Jamal
22 Al-Fadl's testimony has been accepted in
23 court proceedings and frequently
24 corroborated by other source information.
25 Correct?

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2 A. Correct.

3 Q. Or you assert that, I should
4 say.

5 Mr. Fadl, al-Fadl, has not
6 testified about his alleged
7 identification of Mr. Kadi, has he, to
8 your knowledge?

9 A. To my knowledge, I do not
10 recall he ever has.

11 Q. Do you recall that he's
12 testified at all about Mr. Kadi?

13 A. I believe that he testified
14 about Al-Kadi. But I'm not -- I don't
15 know for sure right now. I'd have to
16 look at my notes.

17 Q. Okay.

18 MR. SALERNO: I'll ask the
19 videographer to put up tab 019.
20 Should be 988.

21 (Deposition Exhibit 988 for
22 identification, Treasury Department
23 press release dated September 6,
24 2002.)

25 BY MR. SALERNO:

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2 A. Correct.

3 Q. I'll ask you a question that
4 may be familiar to you now. To whom
5 should a rationale have been presented?

6 A. It was a company, to its
7 records, to facilities that can kept -- a
8 company should do its own accounting,
9 shouldn't it not? They should be
10 explained. Their activities should be
11 explained. If they go unexplained, they
12 raise questions. If they raise
13 questions, they create risks. If they
14 create risks, they are vulnerable. If
15 they are vulnerable in an atmosphere
16 where a vulnerability can be taken
17 advantage of, their money is lost.

18 So to whom should it be
19 explained? To their own accountants, to
20 their own accounting facility. Should
21 they have accounting, yes. And what
22 company should not know what it's doing,
23 where its money is going, what's
24 happening. But there is no record of any
25 of that in these cases.

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2 Q. Well, have you seen all the
3 financial records of the Kadi companies
4 we've been discussing?

5 A. I've seen enough to know that
6 there are blanks. And the companies
7 where there were some recordings of
8 accounting, such as in Pakistan, the
9 accountants had to rely on information
10 that was simply relying on the statements
11 of the managers or the directors.

12 Q. Well, your knowledge of what
13 you allege here is based entirely on your
14 assumption that documents that you have
15 not seen support the proposition that
16 they're still unexplained. Am I not
17 correct about that?

18 MR. MALONEY: Objection.

19 Q. You can answer.

20 A. Listen, they are unexplained
21 as far as I could tell. If there is
22 explanation, I certainly hope it will be
23 presented. That's not my job. My job is
24 to take a look at what I know is to be
25 the situation. And what I know to be the

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2 situation is that these are unexplained.
3 If there is an explanation, please
4 provide it. That's your job, not mine.

5 Q. On page 50 of your main
6 report. I will pause for you to get
7 there.

8 A. Thank you. Okay.

9 Q. You discuss the el-Eman, e-l,
10 new word, E-m-a-n, dormitory project for
11 which Kadi arranged Julaidan to arrange
12 construction. Correct?

13 A. Correct.

14 Q. And you conclude that
15 between -- and this is a quote, between
16 926,000 and 1.28 million of the
17 Kadi/Karavan, Karavan with a K, provided
18 funding for this transaction remained
19 unaccounted for and was likely skimmed
20 off for our purposes including Al Qaeda,
21 close quote.

22 Did I read that correctly?

23 A. You did.

24 Q. And then if you could turn to
25 page 33 of your main report.

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2 A. I don't know what you're
3 talking about. I think that Saudi
4 support, Saudi individual support through
5 charitable negotiation -- charitable --
6 excuse me, I'm getting tongue-tied.
7 Charitable donations and other
8 activities, continued. And that there
9 was -- it was not stemmed at all at that
10 point, no. Animosity, that official
11 government position might not have had
12 that kind of an impact on Saudi Arabian
13 citizens generally.

14 Q. Okay.

15 MR. NASSAR: We can take the
16 document down.

17 Q. Sir, you cite extensively to
18 an individual named Jamal al-Fadl
19 throughout your report. Do you believe
20 Jamal al-Fadl to be a credible source?

21 A. I believe that the -- he's a
22 credible source because he was deemed to
23 be a credible source by the U.S.
24 Department of Justice, as well as the
25 court structures that heard his cases.